

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

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v.

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CRIMINAL NO. CCB-20-0285

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JOHNSON B. OGUNLANA and
SAMSON A. OGUNTUYI,

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Defendants.

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**SUPPLEMENT TO JOINT MOTION OF THE UNITED STATES AND DEFENDANT
SAMSON A. OGUNTUYI FOR ENTRY OF AN ORDER
REGARDING THE STATEMENT OF JOHNSON B. OGUNLANA**

The United States of America submits this supplement attaching a modified version of the Proposed Order attached to the joint motion of the United States and defendant Samson A. Oguntuyi dated July 26, 2021 (ECF 55). In response to an issue raised by the Court and defendant Johnson B. Ogunlana at the pretrial motions hearing on August 18, 2021, the Government and Oguntuyi have agreed to modify the paragraph at the bottom of page 2 of the Proposed Order as follows (added text in *italics*):

ORDERED that counsel for Ogunlana is not permitted to cross examine the government *witness* about *Ogunlana's statements regarding* the identities of Oguntuyi, "Uncle Ben," Abayomi Britto, or Abiodun Shobaloju, or any other information that has been omitted from Attachment 1-A, as reflected in strikethroughs contained in Attachment 1-B;

This proposed modification was presented to counsel for Ogunlana on August 19, 2021. As of the time of this filing, Ogunlana has taken no position on the proposed modification.

For the reasons explained at the pretrial motions hearing, in the joint motion (ECF 55), and in the Government's reply in support of the joint motion (ECF 58), the Government respectfully requests that the Court enter the modified version of the Proposed Order attached hereto.

Respectfully submitted,

Jonathan F. Lenzner
Acting United States Attorney

/s/
Matthew Maddox
Assistant United States Attorney

Michael Davio
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing supplement and attachment were served electronically via ECF to counsel of record for all parties.

/s/
Matthew Maddox
Assistant United States Attorney